

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PROJECT VERITAS ACTION
FUND,

Plaintiff,

v.

DANIEL F. CONLEY,
SUFFOLK COUNTY DISTRICT
ATTORNEY

Defendant.

Civil Action No. 16-10462-LTS

MOTION TO EXCEED PAGE LIMIT

Pursuant to Local Rule 7.1(b)(4), the Defendant moves for leave to file the *Memorandum of Law In Support Of Motion To Dismiss, And, In The Alternative, In Opposition To Motion For Preliminary Injunction* in excess of twenty pages. As grounds therefor, the Defendant states:

1. The parties previously agreed on deadlines for briefs and that the Defendant would file a joint response to the Plaintiff's Complaint and Motion for Preliminary Injunction. Docket No. 16.

2. The Defendant is filing a Motion to Dismiss and, in the Alternative, Opposition to Motion for Preliminary Injunction along with a supporting memorandum of law. That supporting memorandum of law totals thirty-five pages, including cover page, table of contents, and signature page. A copy of the memorandum of law is attached hereto as Exhibit A.

3. If the Defendant were to file a separate motion to dismiss and a separate opposition to the motion for a preliminary injunction, then each of those briefs could be twenty pages per Local Rule 7.1(b)(4). The combined memorandum of law is shorter.

4. Undersigned counsel has conferred with counsel for the Plaintiff, which assents to this motion.

WHEREFORE, the Defendant seeks leave of court to file the attached *Memorandum Of Law In Support Of Motion To Dismiss, And, In The Alternative, In Opposition To Motion For Preliminary Injunction*, which exceeds the twenty-page limit.

Respectfully submitted,

For District Attorney Daniel Conley:

MAURA HEALEY
ATTORNEY GENERAL

/s/ Ryan E. Ferch
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Dated: June 24, 2016

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Ryan E. Ferch
Ryan E. Ferch